

Appl. No. : 09/826,121  
Filed : April 4, 2001

#### REMARKS

Reconsideration and allowance of the above-referenced application are respectfully requested.

The examiner is thanked for the careful consideration of this application.

Claims 1-4, 7-9, 11-14, 41-42 and 45-52 stand rejected under 35 USC 101 as allegedly being directed to non-statutory subject matter. In response, each of these claims are amended to clarify that the process steps are "tied to a machine". Therefore, these claims should be statutory per the holding of *in re Bilski*.

Claims 1-4, 7-9, 11-14, 29-32, 35-37, 39-43 and 45-52 stand rejected under 35 USC 112, first paragraph, as allegedly failing to comply with the written description requirement. In response, the claims are amended to clarify the subject matter being claimed and how that subject matter is supported by the specification as filed.

Specifically, however, note that the specification clearly explains that customer service representatives can have access to certain information, and can change the certain databases. For example, column 11 lines 10-15 explains that the customer service representative can maintain customer records, and can also access purchase and information requests.

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This customer service representative has logged in via a secured identification and password see page 11 line 17. In general, the customer service rep can access the customer records, and can do things that effect inventory. For example, the customer service rep can check status of existing orders, and the like. Page 6, for example lines 14-18 describe how the different secure login ID provides access to different information. Moreover, page 6 lines 19-20 describes how the customer service rep gets access to customer information administration information, but has no access to inventory management.

The inventory management capability is provided with reference to the inventory management module that is granted to a product manager see for example page 17, lines 17-20.

The above explains how the claims, as amended, are wholly supported by the specification. This also emphasizes the way in which the claims distinguish over the prior art. The rejection has raised the contention that these claims are no different than a well-known access control list.

The claims define the advantages over simple access control lists. As claimed, a user (e.g., a CSR) can obtain access to one part for example of the database (here the customer database and product database). That user cannot get access, for example, to another part of the database to manage the inventory, even though things that CSR does EFFECT the inventory.

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That user, e.g., the CSR, can therefore EFFECT the inventory, but cannot MANAGE the inventory.

A different user, however, can MANAGE the inventory.

The present system, in contrast, describes multiple different databases (customer database, product database, user database, inventory database). One set of users gets access to the customer database and can do things that effect the inventory database. However, for example, a customer service rep as abilities such as accepting return information (see page 8 lines 6-9) and purchase information (see page 8 lines 17-21). The customer service rep also has access to "order information 158" (page 9 line 18) the "low level indicator" (page 9 line 24) and other inventory information. The customer service rep and can access this information and can do things that effect this information. However, the customer service reps cannot actually manage the inventory information.

The dependent claims should be allowable for reasons discussed above with respect to claim 1. New claim 53 is added. An advantage of this new dependent claim is that allows seeing into the supply chain, while maintaining access to the inventory.

Therefore, this is more than just simple access control lists for different users to have different capability. This system allows, for example, effecting the inventory from one set of users, via access to a first set of databases. A second set of users get to manage the inventory.

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Therefore, while there is still interaction among the databases, and among the users with their respective capabilities, this interaction specially interacts in a way that is more than just a simple access control list as defined by the prior art.

More specifically, claims 1-4, 7-9, 11-14, 29-32, 35-37, 39-43 and 45-52 stand rejected under 35 USC 103 as allegedly being unpatentable over Henderson , Mikurak and Kirkpatrick.

The amendments made herein emphasize the patentable distinctions over this prior art. Applicant agrees that these references show different ways in which users can interact with customer databases.

Henderson teaches a method and system for automated customer service, which relies on a customer using a pin number to access a customer database. Henderson teaches using a service card 200 to obtain time for online service. The service card can be purchased or included with the product, see Henderson's column 5 lines 30-32 and Henderson's column 9. A customer calls the access number to get service from a vendor, and is sent to a menu hierarchy. Henderson does not disclose separate databases for customer and product that are updated as claimed, for example in claim 1. Henderson does not show that one user (e.g., the CSR), can effect an inventory database, but another user can manage that database, as claimed.

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The secondary reference to Mikusak discloses a workstation that uses object oriented programing to carry out customer support functions. Mikusak includes a plurality of modules.

Both Henderson and Mikurak are consistent in that they allow customer interaction.

The rejection cites the additional reference to Kirkpatrick to allegedly show an inventory management tool. However, Kirkpatrick does not actually show inventory management - rather teaching registering products, and looking at what others have registered. Kirkpatrick does not describe managing inventory, as defined by all the claims. Kirkpatrick is provided for the purpose of showing that a second client representative can update inventory information at a warehouse. Kirkpatrick may allow the management tool to carry out certain functions, but does not control the first user that can effect inventory and the second user that can manage inventory.

For all these reasons, each of these claims should be allowable.

The request for terminal disclaimer is noted, and applicant intends to file a terminal disclaimer at such time as the claims are indicated as allowable.

For all of these reasons, it is respectfully suggested that all of the claims should be in condition for allowance. A formal notice of allowance is hence respectfully requested.

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If the Examiner believes that communications such as a telephone interview or email would facilitate disposal of this case, the undersigned respectfully encourages the Examiner to contact the undersigned. Recognizing that Internet communications are not secure, I hereby authorize the USPTO to communicate with me concerning any subject matter of this application by electronic mail (using the email address harris@schiplaw.com). I understand that a copy of these communications will be made of record in the application file.

Please charge any fees due in connection with this response, (other than those concurrently paid via EFS), to Deposit Account No. 50-4376.

Respectfully submitted,

Date: 4/8/2009\_\_\_\_\_

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